

EXHIBIT 13

CAUSE NO. 202338238

**SWORN MOTION OF NON-RESIDENT ATTORNEY
JASE A. BROWN TO APPEAR *PRO HAC VICE***

TO THE HONORABLE COURT:

I, Jase A. Brown, under the authority of the Rules of Admission of the Bar of Texas, Rule XIX, file this Sworn Motion to Appear *Pro Hac Vice* in the above-referenced case on behalf of Plaintiff Everest Reinsurance Company. In support of this Motion, I respectfully show the Court as follows:

I. FACTS

1. As a mandatory initial requirement, I have complied with the requirements of Texas Government Code § 82.0361 by paying a non-resident attorney fee to the Board of Law Examiners. A true and correct copy of the Non-Resident Acknowledgment Letter is attached hereto as **Exhibit A**.
 2. My office address is 105 Eisenhower Parkway, Roseland, NJ 07068. My telephone number is (973) 325-1500. My fax number is (973) 530-2277. My e-mail address is jbrown@csglaw.com.
 3. I will be associated in these proceedings with Christopher R. Ward of Clark Hill PLC who will personally participate in this action. Mr. Ward is a practicing attorney and a member of the State Bar of Texas. Mr. Wards's State Bar number is 24008233. His telephone number is (713) 951-5600. His fax number is (713) 951-5660. His e-mail address is cward@clarkhill.com.

4. I have never previously moved to appear *pro hac vice* in Texas state court, nor have I participated in any actions in Texas state court.

5. I am a practicing attorney and active member in good standing with the Bars of the State of New Jersey and New York. My New Jersey State Bar license number is 225202018. My New York State Bar license number is 5909643. I am also admitted to practice, and an active member in good standing, in the following federal courts: U.S. District Court, District of New Jersey; U.S. District Court, Northern District of New York; U.S. District Court, Western District of New York.

6. I have not been the subject of disciplinary action in the last five years by the Bar or courts of any jurisdiction in which I have been licensed.

7. I have not been denied admission to the courts of any State or to any federal court during the last five years.

8. I am familiar with the State Bar Act, the State Bar Rules, and the Texas Disciplinary Rules of Professional Conduct governing conduct of members of the State Bar of Texas. I will at all times abide by and comply with those rules as long as this cause of action is pending and I have not withdrawn as counsel herein.

II. PRAYER

For these reasons, I ask this Court to grant my Sworn Motion to Appear *Pro Hac Vice* and allow me to appear before this Court until the conclusion of this case.

Dated: June 20, 2023

Respectfully submitted,

CHIESA, SHAHINIAN & GIANTOMASI, PC

By:

Jase A. Brown (NJ Bar No. 225202018)
(*Pro Hac Vice* Applicant)
jbrown@csglaw.com
105 Eisenhower Parkway
Roseland, NJ 07068
(973) 325-1500 (Telephone)
(973) 530-2277 (Facsimile)

CLARK HILL, PLC

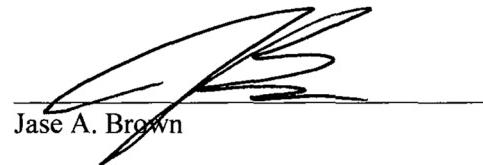
By: /s/ Christopher Ward

Christopher R. Ward (TX Bar No. 24008233)
(Resident Attorney)
cward@clarkhill.com
909 Fannin Street, Suite 2300
Houston, Texas 77010
(713) 951-5600 (Telephone)
(713) 951-5660 (Facsimile)

VERIFICATION

My name is Jase Brown, my date of birth is February 20, 1988, and my business address is 105 Eisenhower Parkway, Roseland, NJ 07068. I declare under penalty of perjury that the statements contained in Paragraphs 1 through 8 of this Sworn Motion of Non-Resident Attorney Jase A. Brown to Appear *Pro Hac Vice* are true and correct and within my personal knowledge.

Executed in Essex County, State of New Jersey, on June 20, 2023.



Jase A. Brown

A handwritten signature in black ink, appearing to read "Jase A. Brown". It is written in a cursive style with a horizontal line underneath it.

CERTIFICATE OF SERVICE

I hereby certify that on June 21, 2023, the foregoing document was filed and served on all counsel of record by electronic case filing in accordance with the Texas Rules of Civil Procedure.

/s/ Christopher Ward
Christopher R. Ward

Automated Certificate of eService

This automated certificate of service was created by the efiling system. The filer served this document via email generated by the efiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Deborah Durr on behalf of Christopher Richard Ward

Bar No. 24008233

ddurr@clarkhill.com

Envelope ID: 76861503

Filing Code Description: Motion (No Fee)

Filing Description: Motion of Resident Attorney Ward in Support of Pro

Hac Vice of Jase Brown

Status as of 6/22/2023 12:12 PM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Adam Diamond		ADiamond@clarkhill.com	6/22/2023 11:20:02 AM	SENT
Christopher RichardWard		cward@clarkhill.com	6/22/2023 11:20:02 AM	SENT
Jase ABrown		jbrown@csglaw.com	6/22/2023 11:20:02 AM	SENT
Becky Delancy		bdelancy@clarkhill.com	6/22/2023 11:20:02 AM	SENT

Exhibit A

Board of Law Examiners

Appointed by the Supreme Court of Texas

June 21, 2023

Jase Brown
Via: E-Mail

Acknowledgment Letter
Non-Resident Attorney Fee

According to Texas Government Code §82.0361, "a nonresident attorney requesting permission to participate in proceedings in a court in this state shall pay a fee of \$250 for each case in which the attorney is requesting to participate."

This Acknowledgement Letter serves as proof that the Board of Law Examiners has received \$250 in connection with the following matter:

Non-resident attorney: Jase Brown

Case: 202338238

Texas court or body: District Court, 133rd Judicial District, Harris County

After satisfying the fee requirement, a non-resident attorney shall file a motion in the Texas court or body in which the non-resident attorney is requesting permission to appear. The motion shall contain the information and statements required by Rule 19(a) of the Rules Governing Admission to the Bar of Texas. The motion must be accompanied by this Acknowledgment Letter and by a motion from a resident practicing Texas attorney that contains the statements required by Rule 19(b).

The decision to grant or deny a non-resident attorney's motion for permission to participate in the proceedings in a particular cause is made by the Texas court or body in which it is filed.

For more information, please see Rule 19 of the Rules Governing Admission to the Bar of Texas and §82.0361, of the Texas Government Code, which can be found on the Board's website.

Cordially,



Nahdiah Hoang
Executive Director

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205 West 14th Street, Ste.500
Austin, Texas 78701

CAUSE NO. 202338238

ZURICH AMERICAN INSURANCE
COMPANY, HCC INTERNATIONAL
INSURANCE COMPANY PLC,
PHILADELPHIA INDEMNITY INSURANCE
COMPANY AND EVEREST REINSURANCE
COMPANY,

IN THE DISTRICT COURT OF

HARRIS COUNTY, TEXAS

133rd JUDICIAL DISTRICT

APACHE CORPORATION,

Defendant.

**ORDER GRANTING SWORN MOTION OF NON-RESIDENT
ATTORNEY JASE A. BROWN TO APPEAR *PRO HAC VICE***

After consideration of the Sworn Motion of Jase A. Brown to Appear *Pro Hac Vice* in this Action (the “Motion”), filed under Rule XIX of the Rules of Admission of the Bar of Texas, the Court finds the Motion to be well taken. It is, therefore, hereby

ORDERED that Jase A. Brown of the law firm Chiesa Shahinian & Giantomaso PC shall be admitted *pro hac vice* in this matter as counsel for Plaintiff Everest Reinsurance Company.

IT IS SO ORDERED.

DATED:

JUDGE PRESIDING

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Christopher RichardWard		cward@clarkhill.com	6/22/2023 11:20:02 AM	SENT
Jase ABrown		jbrown@csglaw.com	6/22/2023 11:20:02 AM	SENT
Adam Diamond		ADiamond@clarkhill.com	6/22/2023 11:20:02 AM	SENT
Becky Delancy		bdelancy@clarkhill.com	6/22/2023 11:20:02 AM	SENT